



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

August 6, 2021

BY ECF

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Shuai Sun, 18 Cr. 905 (SHS)*

Dear Judge Stein:

The Government writes to respectfully request an extension of time in which to file its proposed jury charge, voir dire, and any motions *in limine* in connection with trial in the above-captioned case. The Government understands that the Court has requested a trial date of December 13, 2021. Based on that proposed date, the Government respectfully requests until September 6, 2021—approximately one month from now—to submit its pretrial filings, with responses being due by September 20, 2021. The Government has conferred with defense counsel who consents to this request and has further requested the opportunity to supplement her existing filings during the same time period, if necessary.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By: /s/ Alexandra Rothman

Alexandra Rothman
Assistant United States Attorney
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The government's requests to submit its pretrial filings by September 6, and any responses by September 20 is granted. The defense may supplement her existing filings during that same period.

Dated: New York, New York

August 9, 2021

SO ORDERED

SIDNEY H. STEIN
U.S.D.J.